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## PACIFIC LIFE POLITICAL ACTION COMMITTEE

April 29, 2002

Thomas F. Maxwell, III  
Reports Analyst  
Federal Election Commission  
Reports Analysis Division  
999 E Street, N.W.  
Washington, D.C. 20463

ELAINE M. HAVENS  
Chairman

ROBERT G. HASKELL  
Treasurer

Re: Pacific Life Insurance Company PAC (PLPAC)  
I.D. #C00068528  
Periods Covered: 7/1/01-7/31/01, 8/1/01-8/31/01, and 9/1/01-9/30/01

Dear Mr. Maxwell:

Thank you for your letter of March 1, 2002, suggesting amendment for the above-mentioned monthly-filed reports.

After reviewing the code section referenced in your letter (11 CFR 104.8(b)) I understand the required information is "...a statement of the amount deducted per pay period." Our reports indicate both "payroll deduction" and the "Amount of Each Receipt this Period" which directly corresponds to the payroll deduction amount and interval of its payment (we file monthly).

Based on the information already contained in our report, and the understanding from our FEC software vendor Grossos that the information you have requested is optional, we consider the referenced reports legally filed.

Please feel free to contact me if you have any questions.

Sincerely,

Robert G. Haskell  
Treasurer, Pacific Life PAC  
Senior Vice President, Public Affairs  
Pacific Life Insurance Company

cc: Grossos

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

MAR 01 2002

Robert G. Haskell, Treasurer  
Pacific Life Insurance Company Political Action  
Committee  
700 Newport Center Drive  
Newport Beach, CA 92660

Identification Number: C00068528

Reference: August Monthly (7/1/01-7/31/01), September Monthly (8/1/01-8/31/01) and  
October Monthly (9/1/01-9/30/01) Reports

Dear Mr. Haskell:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas F. Maxwell, III". The signature is written in a cursive style with a large, stylized "T" at the beginning.

Thomas F. Maxwell, III  
Reports Analyst  
Reports Analysis Division

(3) The treasurer reports all contribution information not provided by the contributor, but in the political committee's possession, or to its connected organization's possession, regarding contributor identifications, including information in contributor records, fundraising records and previously filed reports, in the same two-year election cycle in accordance with 11 CFR 104.3; and

(4)(i) If any of the contributor information is received after the contribution has been disclosed on a regularly scheduled report, the political committee shall either:

(A) File with FERC next regularly scheduled report, an amended memo Schedule A listing all contributions for which contributor identifications have been received during the reporting period covered by the next regularly scheduled report, together with the dates and amounts of the contribution(s) and an indication of the previous report(s) to which the memo Schedule A relates; or

(B) File on or before its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s), which include the contributor identifications together with the dates and amounts of the contribution(s).

(ii) Amendments must be filed for all those contributions from the same contributor. However, political committees are not required to file amendments to reports covering previous election cycles.

16 FR 16108, Mar. 7, 1990, as amended at 58 FR 5732, Oct. 27, 1993; 60 FR 23838, Apr. 20, 1995; 65 FR 46284, July 11, 2000]

(d)(1) If an itemized contribution is made by more than one person in a single written instrument, the treasurer shall report the amount to be attributed to each contributor.

(2)(i) If a contribution is redesignated by a contributor, in accordance with 11 CFR 110.1(b) or 110.2(b), the treasurer of the authorized political committee receiving the contribution shall report the amount to the political committee's reporting period in which the contribution is received. The memo entry on Schedule A of the report covering the period in which the redesignation is received shall include the name of the individual who contributed the amount.

(ii) If a contribution is redesignated by a contributor, in accordance with 11 CFR 110.3(b), the treasurer of the authorized political committee receiving the contribution shall report the amount to the political committee's reporting period in which the contribution is received. The memo entry on Schedule A of the report covering the period in which the redesignation is received shall include the name of the individual who contributed the amount.

each redesignated contributor shall be reported in the following manner—

(A) The first part of the memo entry shall disclose all of the information for the contribution as it was originally reported on Schedule A;

(B) The second part of the memo entry shall disclose all of the information for the contribution as it was redesignated by the contributor. Including the election for which the contribution was redesignated and the date on which the redesignation was received.

(C) If a contribution from a political committee is redesignated by the committee, the treasurer of the political committee receiving the refund shall report the refund on Schedule A of the report covering the reporting period in which the refund is received, in accordance with 11 CFR 104.3(a).

(D) National party committees shall disclose in a memo Schedule A information about each individual, committee, corporation, labor organization, or other entity that donates an aggregate amount in excess of \$200 in a calendar year to the committee's non-federal account(s). This information shall include the donating individual's or entity's name, mailing address, occupation or type of business, and the date of receipt and amount of any such donation. If a donor's name is known to have changed since an earlier donation reported during the calendar year, the exact name or address previously used shall be noted with the first reported donation from that donor subsequent to the name change. This memo entry shall also include, where applicable, the information required by paragraphs (b) through (d) of this section.

(E) The first part of the memo entry shall disclose all of the information for the contribution as it was originally reported on Schedule B;

(F) The second part of the memo entry shall disclose all of the information for the contribution as it was redesignated by the contributing political committee, including the election for which the contribution was redesignated and the date on which the redesignation was made.

(G) If an itemized contribution is attributed by the contributor(s) in accordance with 11 CFR 110.1(k), the treasurer shall report the redistribution in a memo entry on Schedule A of the report covering the reporting period in which the redistribution is received. The memo entry for each redistributed contribution shall be reported in the following manner—

(i) The first part of the memo entry shall disclose all of the information for the contribution as it was originally reported on Schedule A;

(ii) The second part of the memo entry shall disclose all of the information for the contribution as it was redesigned by the contributor, including the date on which the redesignation was received.

(4) If a contribution is refunded to the contributor, the treasurer of the political committee making the refund shall report the refund on Schedule A of the report covering the reporting period in which the refund is made, in accordance with 11 CFR 104.3(b). If a contribution is refunded to a political committee, the treasurer of the political committee receiving the refund shall report the refund on Schedule A of the report covering the reporting period in which the refund is received, in accordance with 11 CFR 104.3(a).

(5) National party committees shall disclose in a memo Schedule A information about each individual, committee, corporation, labor organization, or other entity that donates an aggregate amount in excess of \$200 in a calendar year to the committee's non-federal account(s). This information shall include the donating individual's or entity's name, mailing address, occupation or type of business, and the date of receipt and amount of any such donation. If a donor's name is known to have changed since an earlier donation reported during the calendar year, the exact name or address previously used shall be noted with the first reported donation from that donor subsequent to the name change. The memo

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5-14-82

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